

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : **CHAPTER 13**
Yongping Wang :
Debtor : **BANKRUPTCY NO.: 19-16681-amc**

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Certification of Default, represents the following:

1. The Debtor has the funds to cure (pay in full) the delinquent amounts alleged by the Movant.
2. The funds needed to cure are readily available and the debtor intends to tender them to the Movant without delay.
3. The Debtor is requesting a hearing on this matter so that he may have the opportunity to cure any delinquency.
4. The Debtor expects be totally current on the account before the hearing date.

WHEREFORE, Debtor prays that a hearing be set on this matter.

Date: 12/30/2020

Respectfully submitted,

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
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Attorney for Debtor